

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA	:	CRIMINAL INDICTMENT
	:	
v.	:	NO.1:09-CR-181
	:	
LAWRENCE EDWARD PRUITT,	:	
a/k/a Paulo, and	:	
MARVIS NICHOLE HARRIS	:	
a/k/a Brianna	:	

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning on or about February 19, 2009, and continuing until on or about February 21, 2009, in the Northern District of Georgia, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, did combine, conspire, confederate, agree and have a tacit understanding to commit an offense against the United States, that is, to knowingly recruit, entice, harbor, transport, provide and obtain by any means, in and affecting interstate commerce, a minor under the age of 18 years, namely "M.C.", knowing that "M.C." had not attained the age of 18 years and knowing that "M.C." would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and 2.

MANNER AND MEANS OF THE CONSPIRACY

1. As a part of the conspiracy, the defendants, LAWRENCE

EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, recruited minor and adult victims to work as prostitutes.

2. As a part of the conspiracy, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, posted nude photographs of "M.C.," by use of a computer, in an erotic classified advertisement section of an internet website for the purpose of causing "M.C." to engage in prostitution.

3. As a part of the conspiracy, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, communicated with each other, and with potential prostitution customers for "M.C.," using mobile telephones.

4. As a part of the conspiracy, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, drove "M.C." to various locations in the Atlanta, Georgia, area, including various hotels conducting business in and affecting interstate commerce, to work as a prostitute.

5. As a part of the conspiracy, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, transported "M.C." on interstate highways between the various locations in the Atlanta, Georgia, area where the defendants arranged for "M.C." to work as a prostitute.

6. As a part of the conspiracy, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, instructed "M.C." the fees to charge for certain sexual acts.

7. As a part of the conspiracy, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, obtained cash payments earned by "M.C." from her work as a prostitute.

8. As a part of the conspiracy, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, planned to transport "M.C." to the State of Florida to work as a prostitute.

OVERT ACTS

1. On or about February 19, 2009, a person whose identity is unknown to the grand jury, recruited "M.C.", age 17 years, to work

as a prostitute, knowing that "M.C." had not yet attained the age of 18 years.

2. On or about February 19, 2009, a person whose identity is unknown to the grand jury, drove "M.C." to a hotel in the Atlanta, Georgia, area to meet with Defendants LAWRENCE EDWARD PRUITT, also known as Paulo, and MARVIS NICHOLE HARRIS, also known as Brianna.

3. On or about February 19, 2009, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, took nude photographs of "M.C.", for the purpose of advertising those nude photographs of "M.C." in an erotic services section of an internet website.

4. On or about February 19, 2009, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, told "M.C." to charge certain rates for various commercial sex acts, including \$120 for both oral sex and sexual intercourse during an hour-long session, \$85 for both oral sex and sexual intercourse during a thirty minute-long session, and \$50 for oral sex only.

5. On or about February 19, 2009, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, drove "M.C." to a

hotel in the Atlanta, Georgia, area to work as a prostitute.

6. On or about February 19, 2009, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, obtained money from "M.C." that "M.C." earned from her work as prostitute at a hotel in the Atlanta, Georgia, area.

7. On or about February 20, 2009, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, and MARVIS NICHOLE HARRIS, told "M.C." to falsely state to others, during her work as a prostitute, that she was 19 years-old, knowing that "M.C." was in fact 17 years-old.

8. On or about February 20, 2009, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, drove "M.C." to a hotel in the Atlanta, Georgia, area to work as a prostitute.

9. On or about February 20, 2009, the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, obtained money from "M.C." that "M.C." earned from her work as a prostitute at a hotel in the Atlanta, Georgia, area.

10. On or about February 21, 2009, the defendants, LAWRENCE

EDWARD PRUITT, also known as Paulo, MARVIS NICHOLE HARRIS, also known as Brianna, and a person whose identity is unknown to the grand jury, aided and abetted by each other, drove "M.C." to a hotel in the Atlanta, Georgia, area to work as a prostitute.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

From on or about February 19, 2009, and continuing through on or about February 21, 2009, in the Northern District of Georgia, Defendant LAWRENCE EDWARD PRUITT, also known as Paulo, and other persons known and unknown to the grand jury, aided and abetted by each other, did knowingly recruit, entice, harbor, transport, provide and obtain by any means, in and affecting interstate commerce, a minor under the age of 18 years, namely "M.C.", knowing that "M.C." had not attained the age of 18 years and knowing that "M.C." would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and 2.

FORFEITURE PROVISION

This indictment charges the defendants, LAWRENCE EDWARD PRUITT, also known as Paulo, and MARVIS NICHOLE HARRIS, also known as Brianna, with violations of Title 18, United States Code, Section 1591, and upon conviction of any of such violation of the law, pursuant to 18 U.S.C. § 1594, the defendants shall forfeit to the United States any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of

such offenses, and any property, real or personal, that constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offenses, including, but not limited to the following:

- (a) a sum of money equal to the amount of proceeds obtained as a result of the offense(s);
- (b) black Dell Laptop;
- (c) Cannon Powershot SD 750 digital camera;
- (d) silver Sansa 1GB USB drive;
- (e) blue Micro Center 2GB USB drive;
- (f) Blackberry Storm phone;
- (g) Metro PCS cell phone;
- (h) Metro PCS cell phone;
- (i) Metro PCS cell phone;
- (j) Metro PCS cell phone;
- (k) Metro PCS cell phone;
- (l) LG cell phone;
- (m) LG Verizon cell phone;
- (n) Nokia cell phone; and
- (o) Nokia cell phone.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a

third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

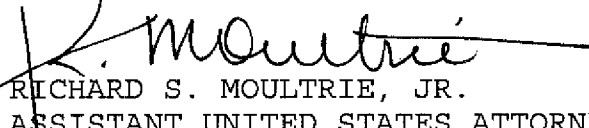
(e) has been commingled with other property which cannot be divided without difficulty;

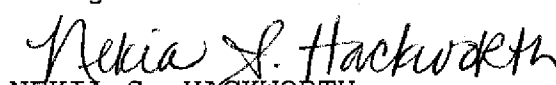
it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property.

A _____ BILL

FOREPERSON

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